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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket No. 95-185
	)	
Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Service Providers	)	CC Docket No. 94-54

To: The Commission

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COMMENTS

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Summary

Arch Communications Group, Inc. ("Arch") is one of the largest providers of wireless messaging services in the United States, providing local, regional and nationwide service. Consistent with its nationwide presence, Arch is a party to numerous interconnection arrangements. Thus, Arch is qualified to provide informed comment in the instant proceeding.

Arch applauds and supports the Commission's efforts to ensure that Commercial Mobile Radio Service ("CMRS") providers are compensated for the costs incurred in connection with the termination of traffic from the Local Exchange Carrier's ("LEC") and Inter Exchange Carrier's ("IXCs") networks. Arch concludes, however, that the compensation mechanism adopted for narrowband CMRS ("NCMRS") providers should differ from that adopted with respect to broadband CMRS providers in light of the unique characteristics of the LEC-NCMRS traffic flow.

Arch supports the Commission's conclusion that NCMRS providers should recover the costs associated with call termination. Arch suggests that the costs of dedicated facilities should be recovered on a non-traffic sensitive basis and that, in the case of LEC-NCMRS traffic, those costs should be borne by the LEC as incidental to the service the LEC provides to its end-users. The costs of shared facilities (e.g., switching facilities) should be

recovered in a manner that apportions costs among users. Arch supports compensation for termination of calls routed over IXC facilities based upon these same principles.

Since data regarding the costs associated with NCMRS carriers' provision of call termination service previously has not been compiled for compensation purposes, a surrogate compensation framework must be adopted until such cost data can be assimilated and evaluated. Arch suggests that the Commission adopt a longstanding LEC charge component as the interim basis for compensation to NCMRS providers. The adoption of this mechanism would add symmetry to the compensation equation since it is based upon charges that traditionally have been imposed by LECs. Arch does not support the adoption of a Bill and Keep mechanism. Due to the unidirectional flow of LEC-NCMRS traffic, a Bill and Keep arrangement places NCMRS providers at a competitive disadvantage to other CMRS providers.

Additionally, Arch requests that the Commission prohibit recurring charges for telephone numbers or, in the alternative, establish a maximum monthly charge for these numbers based on cost data. Discriminatory charges and recurring monthly charges for telephone numbers have unduly increased the costs of interconnection to paging companies.

Arch suggests a mandatory negotiation period of three months for new interconnection arrangements and six months from the date of adoption of an order in this proceeding for the re-negotiation of existing interconnection arrangements which do not comply with the Commission's policy of mutual compensation. If the parties have failed to reach, at the end of the mandatory negotiation period, a mutually acceptable compensation arrangement, the NCMRS provider may recover costs via the interim mechanism proposed herein, pending the resolution of any complaint filed with the FCC or request for arbitration by a state commission.

Finally, compensation arrangements should be made publicly available through the filing of contracts with the Commission. Public availability of these arrangements will enable NCMRS providers and the Commission to ferret out and eliminate discrimination in the rates, terms and conditions of interconnection arrangements.

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COMMENTS

Arch Communications Group, Inc. ("Arch"), by its attorneys and pursuant to Sections 1.415 and 1.419[1/] of the Commission's Rules, hereby files its Comments with respect to CC Docket No. 95-185 referenced above. The following is respectfully shown:

1. Arch is one of the largest providers of paging service in the United States.[2/] Arch provides wireless messaging services, primarily paging, to over two million units in 27 states, and has acquisitions pending

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1/ 47 C.F.R. §§1.415, 1.419.

2/ Current industry estimates make Arch the fourth largest paging carrier in the U.S. It will become the third largest upon consummation of the pending acquisition of Westlink Holdings, Inc. ("Westlink").

that will increase the number to 2.5 million units in 38 states. Arch's operations include both common carrier and private paging systems; local, regional and nationwide paging systems; and nationwide PCS operations through its investment in PCS Development Corp. As a paging provider with a nationwide presence, Arch is qualified to comment in this proceeding.

2. Arch is a party to interconnection arrangements in all 27 states in which it operates, having reached agreement with dozens of different Local Exchange Companies ("LECs") for connection to the public switched network. In light of the variations among the terms of these arrangements, Arch has commenced a nationwide evaluation of its interconnection arrangements. Arch believes that the information it has accumulated will be helpful to the Commission in its adoption of a compensation framework to govern LEC-CMRS traffic termination.

I. GENERAL COMMENTS

3. Arch applauds the Commission's recognition that CMRS providers incur costs in connection with the termination of calls from the landline network, and supports the Commission's efforts to ensure that CMRS providers are compensated for the provision of this service. Arch concludes, however, that the compensation framework adopted with respect to broadband CMRS providers, e.g. cellular and

SMR, should be different from that adopted with respect to narrowband CMRS providers, e.g. paging and narrowband PCS. Arch's Comments relate only to compensation for call termination costs incurred by narrowband CMRS ("NCMRS") providers.

4. The interconnection arrangements to which Arch is a party generally include trunk connections to end offices (i.e., Type 1 or Direct Inward Dial ("DID") interconnection services) or trunk connections to tandems (Type 2A interconnection services). Although industry standards clearly define the physical and technical capabilities of these facilities, the terms, conditions and rates of these arrangements vary greatly between interconnection services and between states, among Regional Bell Operating Companies ("RBOCs"), among Bell Operating Companies ("BOCs") within RBOCs, and among other Local Exchange Companies ("LECs"). All of the agreements fall short, however, of fully implementing Commission policies which call for the access provider to offer interconnection on a non-discriminatory basis and to provide mutual compensation for interconnection and call termination.

5. LECs historically have not compensated NCMRS providers for the costs associated with call termination. In fact, LECs have charged NCMRS for the termination of calls which originate on the LECs' networks. Some of the charges imposed on NCMRS exceed those imposed on other CMRS

providers. In light of the long-standing non-compliance with the Commission's policies, Arch believes that mandatory federal guidelines are necessary to ensure that NCMRS licensees are able to obtain interconnection on a non-discriminatory basis and to recover costs associated with the service they provide.

6. As is set forth in greater detail below, Arch suggests that NCMRS carriers be compensated for call termination and that the facilities of the LEC utilized in originating and delivering the call to the NCMRS switching device be borne by the LEC rather than the NCMRS provider. Arch suggests a specific compensation framework below. Further, Arch recommends that charges assessed by LECs for interconnection, including the price of telephone numbers, be the same for NCMRS and other CMRS providers, unless any differences between those charges are justifiable based upon demonstrable differences in cost basis. Finally, Arch advocates that, in order to ferret out discriminatory treatment in interconnection/termination arrangements, the Commission require that the terms of the arrangements be publicly available.

II. COMPENSATION FOR INTERCONNECTED/TERMINATED TRAFFIC BETWEEN LECs AND CMRS PROVIDERS' NETWORKS

7. The Commission concludes that CMRS providers incur costs in connection with the termination of calls and proposes to adopt a regulatory framework to ensure that CMRS

providers recover those costs.[3] Arch agrees with the Commission's finding and supports the Commission's proposal. However, the regulatory frameworks adopted for NCMRS and other CMRS providers must reflect a critical distinction between the traffic pattern of NCMRS and other CMRS providers.

8. Unlike the traffic between LECs and other CMRS providers, the traffic between LECs and NCMRS generally is one way.[4] Traffic is originated by the LEC's customers and is terminated by the NCMRS carrier. This unique traffic pattern warrants special consideration in the adoption of a compensation framework. Any compensation framework that assumes a balanced flow of traffic and employs an offset provision--like is proposed for two-way mobile--will effectively abandon NCMRS providers for whom the underlying assumption is untrue.

A. COMPENSATION ARRANGEMENTS

1. Existing Compensation Arrangements

9. Currently, Arch is a party to interconnection arrangements in 27 states with Bell Operating Companies in

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[3] Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, Notice of Proposed Rulemaking, CC Docket No. 95-185, para. 20 ("NPRM").

[4] While this may change when interactive two-way paging systems flourish, this development is quite a ways off at this time.

six of the seven regional Bell territories, GTE, Sprint, Cincinnati Bell, SNET and a large number of small LECs. These agreements differ vastly with respect to charges assessed for interconnection to the LEC's network depending on the identity of access provider, geographic location and type of interconnection. Although arrangements differ throughout the country, one factor remains constant: LECs charge NCMRS for interconnection to the LEC network and do not specifically compensate NCMRS licensees for providing call termination for 100% of this traffic and incurring costs associated with the provision of that service. In fact, in some instances, NCMRS carriers are charged twice for the facilities used to deliver calls to their networks.

10. For example, in Connecticut, SNET charges Arch a monthly charge for facilities, reflected in SNET's General Subscriber Tariff for private line services, plus a traffic usage charge of $0.0129 ("Type 1 Land-to-Mobile") per minute for the same facility. SNET's Type 1 interconnection facility pricing scheme costs Arch an additional estimated $155 per month per trunk, and provides the LEC with full cost recovery plus contribution for the dedicated facility that connects Arch's paging terminal to SNET's serving wire center ("SWC"). SNET also collects applicable call charges (local and toll) from its customers calling paging telephone numbers provisioned on Arch's Type

1 facilities. SNET's "add on usage charge" is not unique within the LEC industry. Another major LEC assesses Arch a similar usage charge called a "Switched Termination Charge for Interconnection," in addition to monthly recurring charges that apply to dedicated facilities connecting Arch's paging terminals to the LEC's end offices or tandems. Arch is not at liberty to disclose the specific terms of these agreements due to a Confidentiality and Publicity clause within its Interconnection Agreement.

11. Further, some LECs increase the costs associated with interconnection by assessing recurring monthly charges for the use of telephone numbers, notwithstanding their lack of ownership of those numbers. Charges for telephone numbers also vary among interconnection arrangements. Whereas NYNEX assesses no monthly recurring charges for numbers used with Type 1 or DID interconnection services in the State of New York,[5/] SNET charges $52 per block of 100 numbers in the State of Connecticut.[6/] In North Carolina,[7/] BellSouth charges CMRS

5/ New York Telephone Company, P.S.C. No. 900 -- Telephone.

6/ The Southern New England Telephone Company Wireless Interconnection Tariff.

7/ The Arch company operating in North Carolina is Arch Southeast Communications, Inc., d.b.a. Page South - Carolinas.

providers $0.50 per block of 100 numbers,[8] Sprint Mid-Atlantic Telecommunications charges paging carriers $24.00 per block of 100 numbers,[9] and one small LEC, until it eliminated the recurring monthly charges for numbers after recent negotiations, charged Arch $1.09 per telephone number.[10]

12. The fact that some BOCs, as well as small LECs, have found it appropriate to eliminate recurring charges for Type 1 and DID interconnection telephone numbers leads Arch to believe that the cost of administering these numbers is de minimis, and significant one time or recurring charges should not be assessed.

13. Finally, in connection with its evaluation of interconnection arrangements nationwide, Arch has witnessed other instances of discrimination against paging providers in the charges assessed for interconnection, e.g., the assessment of charges for which no cost support data has been provided, and the assessment of different charges for distinct classes of CMRS providers without rational basis.

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[8] BellSouth's North Carolina Connection and Traffic Interchange Agreement ("NCCTIA").

[9] Connection and Traffic Interchange Agreement between Carolina Telephone and Telegraph Company and Arch Southeast Communications, Inc. d/b/a Page South.

[10] Connection and Traffic Interchange Agreement between North State Telephone Company and Arch Southeast Communications, Inc.

Specific examples of such discrimination are set forth in Section VI of these Comments.

14. In sum, Arch's evaluation of existing compensation arrangements highlights the need for federal guidelines that will provide NCMRS carriers with the ability to recover the costs incurred in connection with call termination and that will prevent discrimination and the imposition of non-cost-justified charges in interconnection arrangements.

2. General Pricing Principles

15. Arch supports the Commission's tentative conclusions that: (a) NCMRS providers should recover the costs associated with call termination;[11/] (b) the cost of dedicated facilities transporting traffic from the LEC's customers to the NCMRS provider's switching facilities should be recovered on a non-traffic sensitive basis; and (c) the cost of shared facilities (e.g. switching facilities) should be recovered in a manner that apportions costs among users.

16. With respect to the cost of dedicated facilities, these costs should be borne by the LEC rather than NCMRS carriers. Since LEC-NCMRS traffic is one-way, it originates with the LEC's subscribers and terminates with the NCMRS's subscribers. The LEC should be responsible for

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[11/] NPRM at para. 20.

delivering traffic from its network to the NCMRS switching device as part of the local exchange service the LEC provides its own end users.[12]

3. Pricing Proposals (Interim, Long Term, Symmetrical)

17. Ideally, a cost-based compensation arrangement should be implemented that ensures both interconnecting parties (CMRS/LEC) just and reasonable cost recovery capabilities, regardless of the direction of the traffic. At the present time, insufficient data has been compiled to derive a formula to capture costs incurred by NCMRS carriers in the provision of call termination service. Thus, for the time being, a surrogate framework must be adopted to permit NCMRS operators to recover at least some portion of the costs associated with the provision of call termination service. The Arch proposal set forth in the following section uses a longstanding LEC charge component as the basis for compensation to NCMRS providers. Arch is opposed, however, to utilizing historical LEC charges as a surrogate in the long term. The network element costs involved with originating a call may differ from those associated with terminating a call. And, LEC network element costs may differ from those incurred by CMRS

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[12] With respect to recovery of costs for shared facilities, costs should be recovered through the assessment of a traffic sensitive charge to the LEC.

providers. Thus, a long term cost recovery mechanism could result in different compensation rates.

A. Interim Recovery

18. The NPRM set forth three proposals for compensation during the pendency of this proceeding: Reciprocal Compensation, Cost-based Compensation and Bill and Keep. The Commission has tentatively concluded that the Bill and Keep model should be adopted to ensure that CMRS providers are compensated for call termination pending the outcome of the proceeding. Arch does not support the Bill and Keep model in the one-way service context. Due to the unidirectional flow of such LEC-NCMRS traffic, a Bill and Keep arrangement places NCMRS providers at a competitive disadvantage to other CMRS providers.

19. The Commission recognizes that the Bill and Keep model only is appropriate in certain instances: (1) where traffic flow is fairly balanced, based upon the rationale that each carrier is "paid" in effect by the other carrier's termination of its calls, and (2) where the costs associated with call termination are close to zero.[13/] Applying these criteria, it becomes apparent that the Bill and Keep model is not responsive to the Commission's goal of ensuring cost recovery to all CMRS providers in the case of NCMRS.

[13/] NPRM at para. 61.

20. Even if the Commission determines that the Bill and Keep model is appropriate for broadband CMRS providers, the Commission should adopt a separate mechanism to allow cost recovery for NCMRS call termination. The NCMRS carrier's costs for call termination are not zero. So, the long term compensation mechanism should be based on costs. However, since cost data has not been fully developed and evaluated,[14] Arch suggests an interim compensation mechanism which adds some symmetry to the equation by basing compensation on charges that traditionally have been imposed by LECs.

21. Specifically, Arch suggests an interim compensation mechanism derived from the pricing architecture employed for an interconnection service available from NYNEX in the State of Massachusetts. This interconnection arrangement was first introduced in a 1989 Interconnection Agreement negotiated between the New England Radio Common Carrier Association and NYNEX. The service now is tariffed and referred to as Feature Group 3A in NYNEX's Intrastate Access Tariff.[15] The Feature Group 3A service arrangement allows NCMRS providers in Massachusetts to elect to pay usage charges for the delivery of calls originating on NYNEX's network that normally would be paid by the landline

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[14] Because compensation to NCMRS providers has not been offered by LECs, there has been no reason to assemble and maintain historical cost data.

[15] D.P.U. Mass. No. 15.

user who initiates a call to a paging unit. This service arrangement permits the party initiating a page to make a free intraLATA call, similar to a free 800 call. Arch utilizes this option to provide an incentive to LEC customers to call Arch paging customers.

22. The pricing of land to mobile traffic under the Feature Group 3A arrangement relies on a switched access rate structure that includes originating "Local Switching" and originating "Local Transport" rate elements which vary according to peak and off-peak usage periods. The originating "Carrier Common Line" rate is $0.00. There are no monthly recurring charges for numbers or for facilities used with this service. Feature Group 3A service is essentially Type 1 (end office) interconnection.[16/]

23. Arch proposes as an interim measure that the Feature Group 3A price structure and rates be used as a surrogate to compensate NCMRS carriers for call termination. This interim solution offers a certain symmetry since it is derived from real world charges previously imposed on NCMRS providers for call termination. Under this scenario, NCMRS providers still would have the option to pay the originating switched access rate elements (minus originating CCL) for

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[16/] NYNEX also provides a tandem interconnection service arrangement called "Feature Group 2A." Feature Group 2A land-to-mobile traffic is priced identical to land-to-mobile traffic on Feature Group 3A arrangements. Feature Group 2A also has no monthly recurring charges for telephone numbers or connecting facilities.

calls in areas in which the NCMRS provider previously paid those charges in an effort to incent LEC subscribers to call subscribers of the NCMRS provider's network.

24. Additionally, Arch believes that the costs of dedicated transport facilities should be borne by the LEC rather than the NCMRS providers. These are costs the LEC routinely incurs in other service contexts to provide service to its own subscribers. The current Feature Group 3A pricing concept and its application as a surrogate compensation mechanism supports this hypothesis. Thus, Arch does not support the Commission's proposal that the costs of these dedicated facilities should be recovered through existing access tariff charges levied against the party ordering the facilities.[17]

B. Long Term

25. In the long term, Arch supports a cost-based model for call termination compensation. In order to calculate the costs associated with call termination, NCMRS

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[17] While the obligation to deliver originating traffic to the terminating carrier's network is a responsibility properly placed with the originating carrier, Arch recognizes that the installation of the facilities used to deliver calls to NCMRS networks frequently is done at the request of the NCMRS carrier. In light of this fact, Arch does not object to a sharing of the costs of installation of these facilities, as the facilities serve a benefit to both the LEC and the NCMRS provider. However, Arch believes that the responsibility for maintaining these facilities and transporting traffic over them, and the costs incident thereto, should reside with the LEC.

carriers must determine what facilities within their systems are utilized in the termination of calls, the costs associated with installing and maintaining those facilities, whether additional facilities are required depending upon the amount of usage, and the number of users to whom the costs of the facilities can be allocated. As NCMRS providers previously have not been permitted to recover costs incurred with call termination, many have not conducted these analyses. Arch suggests that the Commission set policies to serve as guidelines to NCMRS licensees in determining the appropriate rate to charge LECs for call termination.[18/]

26. Additionally, Arch requests that the Commission establish guidelines on the rates charged for telephone numbers. The Commission has found that the provision of telephone numbers is an integral component of interconnection. Instances of discriminatory charges levied against paging companies by certain LECs, and recurring monthly charges for telephone numbers, have unduly increased the costs of interconnection for NCMRS providers. Arch urges the Commission to prohibit recurring charges for telephone numbers or, in the alternative, establish a maximum monthly charge for these numbers based on cost data.

18/ For the reasons discussed above, the costs of dedicated transport facilities should be borne by the LEC.

27. Regardless of the template which is adopted to govern NCMRS/LEC cost and revenue sharing, the formulation should be flexible enough to permit parties to negotiate alternative mutually agreeable interconnection arrangements that suit the needs of the parties (e.g., payment of originating switched access rate elements by NCMRS provider to encourage use of its network by LEC customers). In a rapidly evolving communications marketplace, rigid rules will not serve the public interest.

B. IMPLEMENTATION OF COMPENSATION ARRANGEMENTS

1. Negotiations and Tariffing

A. Negotiations

28. Notwithstanding the longstanding Commission's policy requiring mutual compensation for interconnection,[19/] LECs routinely have failed to compensate NCMRS providers for call termination. In the absence of clear guidelines regarding call termination cost recovery, NCMRS operators have lacked the bargaining power to recover the costs associated with the termination of LEC-originated traffic. This persistent refusal to negotiate in good faith for call termination compensation is strong evidence of the need for strict federal guidelines.

[19/] Implementation of Sections 3(n) and 332 of the Communications Act: Regulatory Treatment of Mobile Services, Second Report and Order, GN Docket No. 93-252, 9 FCC Rcd. 1411, para. 232 (1994)("CMRS Second Report and Order").

29. Arch supports a mandatory negotiation period with default arrangements available should the parties not reach agreement. Arch believes that such a negotiation framework would (1) bring LECs to the negotiation table with the knowledge that they cannot avoid compensating NCMRS for service provided, and (2) assure LECs that NCMRS cannot undermine negotiations by demanding compensation unrelated to costs.

30. Arch recommends a mandatory negotiation period of three months for new interconnection agreements. The mandatory re-negotiation of existing interconnection agreements that do not comply with the Commission's mutual compensation policy should occur within 6 months of the adoption of an order in this proceeding. As a safety measure in the event that agreement is not reached between the LEC and NCMRS carrier, Arch recommends that the NCMRS carrier be compensated on a default basis for call termination pursuant to the interim measures proposed in these Comments pending resolution of any complaint filed with the FCC or request for arbitration by a state commission.

B. Tariffing/Public Availability of Arrangements

31. The terms of interconnection arrangements should be publicly available. Public availability of information will enable carriers to ferret out

discrimination in interconnection arrangements between LECs and all categories of CMRS providers (i.e., paging, narrowband PCS, cellular, broadband PCS, specialized mobile radio, etc.). Consequently, Arch urges the Commission to require that interconnection agreements be filed with the FCC (with the identity of the CMRS provider redacted) pursuant to Section 211 of the Communications Act[20/] and made publicly available upon request. Under this approach, the FCC can ensure that interconnection rates are reasonable and not unreasonably discriminatory.

32. Arch does not support the use of tariffs to ensure compliance with the Commission's mutual compensation framework. Tariffs may hinder the flexibility of companies to negotiate tailored compensation arrangements and respond to changing circumstances.

2. Jurisdictional Issues

33. The Commission has the requisite authority to adopt a mandatory framework to govern interconnection arrangements between LECs and NCMRS carriers. The Omnibus Budget Reconciliation Act of 1993 ("OBRA"), complemented by the Telecommunications Act of 1996 ("1996 Act"), and the policy of inseverability all support preemption of the states with respect to the regulation of the rates charged

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[20/] 47 U.S.C. §211.

by NCMRS providers in connection with the provision of call termination service.

34. Section 332(c)(3) of the Communications Act[21] preempts state and local regulation of the rates charged by any CMRS, including NCMRS providers. Charges assessed for the recovery of costs associated with call termination are "rates" charged by NCMRS licensees for the provision of that service. Consequently, although states may regulate other terms and conditions of interconnection, states lack the authority to regulate CMRS call termination rates.

35. The OBRA preemption provision is complemented by Sections 251 and 252 of the 1996 Act.[22] Section 251 of the 1996 Act requires LECs to interconnect with the facilities of other telecommunications providers, e.g., NCMRS providers, and requires that mutual compensation arrangements for the transport and termination of telecommunications be established.[23] The Section also requires the Commission to "complete all actions necessary to establish regulations to implement the requirements of this section."[24] Section 251 explicitly places authority and responsibility for the establishment of guidelines

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21/ 47 U.S.C. §332(c)(3).

22/ 47 U.S.C. §§251, 252.

23/ 47 U.S.C. §251(a)(1), (b)(5).

24/ 47 U.S.C. §251(d)(1).

governing mutual compensation arrangements with the FCC. Section 252 of the 1996 Act further describes the interrelationship between the states' and FCC's oversight of interconnection arrangements. Section 252, which places with the states the responsibility to arbitrate interconnection arrangement disputes, requires that the states "ensure that such resolution and conditions meet the requirements of Section 251, including the regulations prescribed by the Commission pursuant to section 251..."[25/]

36. The doctrine of inseverability further supports the FCC's jurisdiction over interconnection arrangements.[26/] The paging industry has developed from one in which licensees placed into service smaller systems designed to provide service to specific local areas into an industry characterized by extensively built-out wide-area, regional systems which cross state boundaries and, in many instances, provide service to subscribers nationwide.

[25/] 47 U.S.C. §252(c)(1).

[26/] Section 332 of OBRA, in conjunction with Sections 2 and 221 of the Communications Act of 1934, as amended, have removed the state's jurisdiction over intrastate rates charged by CMRS providers without explicitly placing jurisdiction over those rates in the hands of the FCC. However, the FCC clearly has exclusive jurisdiction over rates charged by CMRS providers, absent approval of a state's request to regulate such rates. The inseverability of the intrastate and interstate components of NCMRS compensation for call termination require that jurisdiction over the arrangements related to such compensation reside with the FCC. See, Louisiana Public Service Commission v. FCC, 106 S.Ct. 1890 (1986).